

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Eaton Corporation
2930 Foundation Drive
South Bend, Indiana 46628**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 141-13952-00057	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 19, 2002 Expiration Date: February 19, 2007

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal product forging and fabricating source.

Authorized Individual:	James Seaver
Source Address:	2930 Foundation Drive, South Bend, Indiana 46628
Mailing Address:	2930 Foundation Drive, South Bend, Indiana 46628
General Source Phone Number:	(219) 283-5006
SIC Code:	3462
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) shot blast machine, identified as EU-8, constructed in 1980, equipped with a baghouse and exhausting through stack SV-4, capacity: 28 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (b) One (1) shot blast machine, identified as EU-9, constructed in 1997, equipped with a baghouse and exhausting through stack SV-5, capacity: 34 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (c) Six (6) forge press cells, identified as EU-1 through EU-6, controlled by five (5) hydrostatic precipitators (rotoclones), each cell is equipped with one (1) load tub lift and bowl loader, with a total of two (2) meter boxes, and twenty-one (21) induction coils, with three (3) forge press cells (EU-1 through EU-3) exhausting to stack SV-1 and three (3) forge press cells (EU-4 through EU-6) exhausting to stack SV-2, maximum capacity: 4.05 tons of steel billets per hour, total.
- (d) One (1) forge press cell, identified as EU-13, constructed in 1998, controlled by a hydrostatic precipitator (rotoclone), equipped with one (1) load tub lift, one (1) meter box, one (1) bowl loader, and four (4) induction coils, exhausting to stack SV-9, maximum capacity: 1.04 tons of steel billets per hour.
- (e) One (1) 3,000-ton forge press cell (Serial No. 21601), identified as EU-14, constructed in 1999, controlled by a hydrostatic precipitator (rotoclone) and including five (5) induction coils with a maximum temperature up to 2,250EF, two (2) inverters, one (1) billet load system, one (1) transform conveyor and one (1) cool down conveyor, exhausting through stack SV-9, maximum capacity: 1.04 tons of steel billets per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. There are no boilers at this source.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including two (2) maintenance parts washers with capacities less than 80 gallons each and using only non-halogenated solvents. [326 IAC 8-3]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1]
- (d) Natural draft cooling towers not regulated under a NESHAP.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved roads and parking lots with public access.
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. Specifically including the following equipment, with dry processes exhausting to bag/barrel filters and wet processes having self-contained coolant reservoirs, with equipment in the die set up area exhausting to stack SV-7 and equipment in the tool room exhausting to stack SV-8: [326 IAC 6-1]
 - (1) Engin 20 X 54 lathe
 - (2) Engin 16 X 102 lathe
 - (3) Two (2) 12" wheel grinders
 - (4) Jet abrasive cut off saw
 - (5) Vertical band saw
 - (6) Norton surface grinder
 - (7) Vertical belt polisher
 - (8) Two (2) Taft Peirce surface grinders
 - (9) Cincinnati tool grinder
 - (10) ID/OD grinder
 - (11) Making tool grinder
 - (12) US Electric double end grinder
 - (13) Two (2) double end tool grinders
 - (14) Powermatic belt/disc grinder
 - (15) Abrasive wheel cut off saw
 - (16) 10" double end tool grinder
 - (17) 4 Ft. radial drill press
 - (18) Engin 10 X 30 Lathe

- (19) Bridgeport mill vertical 9 X 42 mill
 - (20) Engin lathe
 - (21) Enterprise horizontal mill
 - (22) Giddings 10TF CNC lathe
 - (23) Giddings 15TF CNC
 - (24) Marvel horizontal saw
 - (25) Madison grinder
 - (26) OKK mill
 - (27) Bridgeport vertical mill
 - (28) Four (4) drill presses
 - (29) Arbor press
 - (30) Johansson drill press
 - (31) Clausing 15" lathe
 - (32) Clausing band saw
 - (33) Kondia power mill
 - (34) Monarch 18" CNC lathe
 - (35) Cinn 273A grinder
 - (36) Heem 18" vertical saw
 - (37) Dewalt 12" radial saw
 - (38) Wadtkin 12" table saw
 - (39) Empire sand blast cabinet
 - (40) 3012U band saw
 - (41) 16" Boring mill
 - (42) Mazak CNC milling machine
 - (43) Okuma CNC Lathe LB35II
 - (44) Okuma CNC Lath L1420
 - (45) Mitsubishi DWC90HA wire EDM
 - (46) Dake movable bed arbor machine
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- (h) Welders for maintenance - have manganese compounds in rod. Small amount of spray cans are used to mark containers for maintenance (Rustoleum) which contains toluene and xylene. [326 IAC 6-1]
 - (i) Oil recovery system.
 - (j) Two (2) electric Tool room heat treat cabinets
 - (k) Water evaporator
 - (l) One (1) plastic blast system, identified as EU-10, constructed in 1994, controlled by a baghouse and Hepa filter, and exhausting to stack SV-6. [326 IAC 6-1]

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

GENERAL CONDITIONS

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

This permit does not convey any property rights of any sort, or any exclusive privilege.

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ / Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section),
or
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Regional Office Telephone No.: 219-245-4870
Regional Office Facsimile No.: 219-245-4877

Failure to notify IDEM, OAQ / Northern Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions

is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the

applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the

request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8][326 IAC 2-2]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Any change or modification that increases the potential to emit PM to 250 tons per year or more shall cause this source to become a major source pursuant to 326 IAC 2-2, PSD, and shall require prior OAQ approval.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure

compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ,

upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.19 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date post-marked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years.

The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) shot blast machine, identified as EU-8, constructed in 1980, equipped with a baghouse and exhausting through stack SV-4, capacity: 28 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (b) One (1) shot blast machine, identified as EU-9, constructed in 1997, equipped with a baghouse and exhausting through stack SV-5, capacity: 34 cubic feet, with a maximum process weight rate of 3.324 tons per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each of the two (2) shot blast machines (EU-8 and EU-9) shall be limited to 0.03 grain per dry standard cubic foot, equivalent to 0.996 pounds per hour from the one (1) shot blast machine identified as EU-8, when operating at a flow rate of 3,907 actual cubic feet per minute, and 1.53 pounds per hour from the one (1) shot blast machine identified as EU-9, when operating at a flow rate of 6,136 actual cubic feet per minute.

D.1.2 Particulate Matter (PM and PM₁₀) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with 326 IAC 2-8, FESOP, the PM₁₀ emissions from the total of the two (2) shot blasting machines (EU-8 and EU-9) shall not exceed 21.89 pounds per hour. This will result in PM₁₀ emissions of less than 95.9 tons per year from the two (2) shot blasting machines. Together with Condition D.2.2(a), this condition shall limit the potential to emit PM₁₀ to less than one hundred (100) tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The potential to emit PM from the total of the two (2) shot blasting machines (EU-8 and EU-9) shall not exceed 43.8 pounds per hour. This will result in PM emissions of less than 192 tons per year from the total of the two (2) shot blasting units. Together with Condition D.2.2(b), this condition shall limit the potential to emit PM to less than 250 tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-2, PSD, do not apply.

D.1.3 Nonapplicable Condition

Condition D.1.2 from FESOP 141-5555-00057, issued on December 11, 1996, which states that the PM₁₀ emissions from the entire source shall not exceed 8.25 tons per month; Therefore, the requirements of 326 IAC 2-7 do not apply, is not applicable because the PM₁₀ hourly limits in Condition D.1.2 of this permit will be sufficient to show that the requirements of 326 IAC 2-7 do not apply. Therefore, Condition D.1.2 from FESOP 141-5555-00057, is hereby rescinded.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between July 29, 2002 and January 25, 2003, in order to demonstrate compliance with Conditions D.1.1 and D.1.2 the Permittee shall perform PM and PM₁₀ testing of the two (2) shot blast machines (EU-8 and EU-9) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.6 Particulate Matter (PM and PM₁₀)

- (a) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with Conditions D.1.1 and D.1.2, the baghouse for PM and PM₁₀ control shall be in operation at all times when the shot blast machine (EU-8) is in operation.
- (b) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with Conditions D.1.1 and D.1.2, the baghouse for PM and PM₁₀ control shall be in operation at all times when the shot blast machine (EU-9) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the shot blasting (EU-8 and EU-9) stack exhausts (SV-4 and SV-5) shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the two (2) shot blast machines (EU-8 and EU-9), at least once per shift when the shot blast machines are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge

and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the shot blast machines (EU-8 and EU-9) when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the shot blast machines (EU-8 and EU-9) stack exhausts (SV-4 and SV-5) once per shift.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain the following:
 - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (c) Six (6) forge press cells, identified as EU-1 through EU-6, controlled by five (5) hydrostatic precipitators (rotoclones), each cell is equipped with one (1) load tub lift and bowl loader, with a total of two (2) meter boxes, and twenty-one (21) induction coils, with three (3) forge press cells (EU-1 through EU-3) exhausting to stack SV-1 and three (3) forge press cells (EU-4 through EU-6) exhausting to stack SV-2, maximum capacity: 4.05 tons of steel billets per hour, total.
- (d) One (1) forge press cell, identified as EU-13, constructed in 1998, controlled by a hydrostatic precipitator (rotoclone), equipped with one (1) load tub lift, one (1) meter box, one (1) bowl loader, and four (4) induction coils, exhausting to stack SV-9, maximum capacity: 1.04 tons of steel billets per hour.
- (e) One (1) 3000-ton forge press cell (Serial No. 21601), identified as EU-14, constructed in 1999, controlled by a hydrostatic precipitator (rotoclone) and including five (5) induction coils with a maximum temperature up to 2250EF, two (2) inverters, one (1) billet load system, one (1) transform conveyor and one (1) cool down conveyor, exhausting through stack SV-9, maximum capacity: 1.04 tons of steel billets per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each of the eight (8) forge press cells (EU-1 through EU-6, EU-13 and EU-14) shall be limited to 0.03 grain per dry standard cubic foot, equivalent to 0.425 pounds per hour from the two (2) forge press cells identified as EU-13 and EU-14, when operating at a flow rate of 1,654 actual cubic feet per minute, 0.478 pounds per hour from the three (3) forge press cells, identified as EU-1 through EU-3, when operating at a flow rate of 1,859 actual cubic feet per minute, and 0.414 pounds per hour from the three (3) forge press cells identified as EU-4 through EU-6, when operating at a flow rate of 1,610 actual cubic feet per minute.

D.2.2 Particulate Matter (PM and PM₁₀) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]

- (a) In order to comply with 326 IAC 2-8, FESOP, the PM₁₀ emissions from the total of the eight (8) forge press cells shall not exceed 0.005 pounds per hour. This will result in PM₁₀ emissions of less than 0.021 tons per year from the eight (8) forge press cells. Together with Condition D.1.2(a), this condition shall limit the potential to emit PM₁₀ to less than one hundred (100) tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The potential to emit PM from the total of the eight (8) forge press cells shall not exceed 0.613 pounds per hour, which is equivalent to potential to emit PM before controls. This will result in PM emissions of 2.68 tons per year from the total of the eight (8) forge press cells. Together with Condition D.1.2(b), this condition shall limit the potential to emit PM to less than 250 tons per year from the total of all facilities at this source. Therefore, the requirements of 326 IAC 2-2, PSD, do not apply.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of

this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM and PM₁₀)

- (a) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with Conditions D.2.1 and D.2.2, the hydrostatic precipitators (rotoclones) for PM and PM₁₀ control shall be in operation at all times when the six (6) forge press cells (EU-1 through EU-6) are in operation.
- (b) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with Conditions D.2.1 and D.2.2, the hydrostatic precipitator (rotoclone) for PM and PM₁₀ control shall be in operation at all times when the one (1) forge press cell (EU-13) is in operation.
- (c) Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with Conditions D.2.1 and D.2.2, the hydrostatic precipitator (rotoclone) for PM and PM₁₀ control shall be in operation at all times when the one (1) forge press cell (EU-14) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

- (a) Visible emissions notations of the forge press cells (EU-1 - EU-6, EU-13 and EU-14) stack exhausts (SV-1, SV-2 and SV-9) shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the forge press cells (EU-1 - EU-6, EU-13 and EU-14) stack exhausts (SV-1, SV-2 and SV-9) once per shift.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. There are no boilers at this source.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including two (2) maintenance parts washers with capacities less than 80 gallons each and using only non-halogenated solvents. [326 IAC 8-3]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1]
- (d) Natural draft cooling towers not regulated under a NESHAP.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved roads and parking lots with public access.
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. Specifically including the following equipment, with dry processes exhausting to bag/barrel filters and wet processes having self-contained coolant reservoirs, with equipment in the die set up area exhausting to stack SV-7 and equipment in the tool room exhausting to stack SV-8: [326 IAC 6-1]
 - (1) Engin 20 X 54 lathe
 - (2) Engin 16 X 102 lathe
 - (3) Two (2) 12" wheel grinders
 - (4) Jet abrasive cut off saw
 - (5) Vertical band saw
 - (6) Norton surface grinder
 - (7) Vertical belt polisher
 - (8) Two (2) Taft Peirce surface grinders
 - (9) Cincinnati tool grinder
 - (10) ID/OD grinder
 - (11) Making tool grinder
 - (12) US Electric double end grinder
 - (13) Two (2) double end tool grinders
 - (14) Powermatic belt/disc grinder
 - (15) Abrasive wheel cut off saw
 - (16) 10" double end tool grinder
 - (17) 4 Ft. radial drill press
 - (18) Engin 10 X 30 Lathe
 - (19) Bridgeport mill vertical 9 X 42 mill
 - (20) Engin lathe
 - (21) Enterprise horizontal mill
 - (22) Giddings 10TF CNC lathe
 - (23) Giddings 15TF CNC
 - (24) Marvel horizontal saw

- (25) Madison grinder
- (26) OKK mill
- (27) Bridgeport vertical mill
- (28) Four (4) drill presses
- (29) Arbor press
- (30) Johansson drill press
- (31) Clausing 15" lathe
- (32) Clausing band saw
- (33) Kondia power mill
- (34) Monarch 18" CNC lathe
- (35) Cinn 273A grinder
- (36) Heem 18" vertical saw
- (37) Dewalt 12" radial saw
- (38) Wadtkin 12" table saw
- (39) Empire sand blast cabinet
- (40) 3012U band saw
- (41) 16" Boring mill
- (42) Mazak CNC milling machine
- (43) Okuma CNC Lathe LB35II
- (44) Okuma CNC Lath L1420
- (45) Mitsubishi DWC90HA wire EDM
- (46) Dake movable bed arbor machine

- (h) Welders for maintenance - have manganese compounds in rod. Small amount of spray cans are used to mark containers for maintenance (Rustoleum) which contains toluene and xylene. [326 IAC 6-1]
- (i) Oil recovery system.
- (j) Two (2) electric Tool room heat treat cabinets
- (k) Water evaporator
- (l) One (1) plastic blast system, identified as EU-10, constructed in 1994, controlled by a baghouse and Hepa filter, and exhausting to stack SV-6.[326 IAC 6-1]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the insignificant brazing equipment, cutting torches, soldering equipment, welding equipment, grinding and machining and plastic blast system at this source shall be limited to 0.03 grain per dry standard cubic foot, equivalent to 0.309 pounds per hour from the equipment exhausting through stack SV-7, when operating at a flow rate of 1,200 actual cubic feet per minute, and 0.540 pounds per hour from the equipment exhausting through stack SV-8, when operating at a flow rate of 2,100 actual cubic feet per minute.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs, in St. Joseph

County, shall ensure that the following requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility without remote solvent reservoirs, in St. Joseph County, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the

waste solvent by weight could evaporate.

Compliance Determination Requirements

D.3.3 Particulate Matter (PM and PM₁₀)

In order to comply with Condition D.3.1, the control devices for PM and PM₁₀ control shall be in operation at all times when the insignificant grinding and machining and plastic blast system are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Eaton Corporation
Source Address: 2930 Foundation Drive, South Bend, Indiana 46628
Mailing Address: 2930 Foundation Drive, South Bend, Indiana 46628
FESOP No.: F 141-13952-00057

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Eaton Corporation
Source Address: 2930 Foundation Drive, South Bend, Indiana 46628
Mailing Address: 2930 Foundation Drive, South Bend, Indiana 46628
FESOP No.: F 141-13952-00057

This form consists of 2 pages

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9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Eaton Corporation
Source Address: 2930 Foundation Drive, South Bend, Indiana 46628
Mailing Address: 2930 Foundation Drive, South Bend, Indiana 46628
FESOP No.: F 141-13952-00057

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management

Office of Air Quality

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

**Eaton Corporation
2930 Foundation Drive
South Bend, Indiana 46628**

F 141-13952, Plt ID 141-00057

On October 3, 2001, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that Eaton Corporation had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a metal product forging and fabricating source with baghouses and hydrostatic precipitators as controls. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

Since the potential to emit PM from each of the two (2) shot blast machines (EU-8 and EU-9) is limited by 326 IAC 6-1, and to make the source a minor source pursuant to 326 IAC 2-2, PSD, PM testing requirements are added to the permit for these facilities.

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between July 29, 2002 and January 25, 2003, in order to demonstrate compliance with Conditions **D.1.1 and D.1.2(a)** the Permittee shall perform **PM and PM₁₀** testing of the two (2) shot blast machines (EU-8 and EU-9) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensible PM₁₀. Testing shall be conducted in accordance with Section C- Performance Testing.

Change 2:

- (a) Reports of deviations from permit requirements, test protocols, and Quarterly Deviation and Compliance Monitoring Reports should be submitted to the Compliance Data Section, and not the Compliance Branch. The address in Conditions B.15, Deviations from Permit Requirements and Conditions C.9, Performance Testing, and C.21, General Reporting Requirements, has been revised as follows:

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section**, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The titles on the Certification and Quarterly Deviation and Compliance Monitoring Report forms are revised as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
~~COMPLIANCE BRANCH~~
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
~~COMPLIANCE BRANCH~~ **DATA SECTION**
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Change 3:

Condition A.5, Prior Permits Superseded, replaced Prior Permit Conditions in the proposed permit to implement the intent of the new rule, 326 IAC 2-1.1-9.5, as follows:

~~A.5 Prior Permit Conditions~~

- ~~(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.~~
- ~~(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.~~

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either**
 - (1) incorporated as originally stated,**
 - (2) revised, or**
 - (3) deleted****by this permit.**
- (b) All previous registrations and permits are superseded by this permit.**

Change 4:

The IDEM, OAQ, has revised Condition B.15, Deviations from Permit Requirements and Conditions, and Condition D.1.8, Parametric Monitoring, to address concerns regarding the independent enforceability of permit conditions [see 326 IAC 2-8-4(5)]. The parametric monitoring condition has been revised to establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. Condition B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

D.1.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the two (2) shot blast machines (EU-8 and EU-9), at least once per shift when the shot blast machines are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise, When for any one reading, the pressure drop across the baghouse shall be maintained within is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. A pressure reading that is outside the above mentioned range is not a deviation from this permit.~~ Failure to take response steps in accordance with Section C - Compliance Monitoring Response Plan - ~~Failure to Take Response Steps Preparation, Implementation, Records, and Reports~~, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Change 5:

326 IAC 2-8-3 requires any application form, report, or compliance certification to be certified by the Authorized Individual. IDEM, OAQ has revised Condition C.8, Asbestos Abatement Projects, to clarify that the asbestos notification does not require a certification by the authorized individual, but it does need to be certified by the owner or operator. IDEM, OAQ has revised Condition C.18, Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the authorized individual is required for the notification sent in response to non-compliance with a stack test.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are

applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition **do not** require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Change 6:

The IDEM, OAQ has restructured Condition C.17 to clarify the contents and implementation of the compliance response plan. The name of the condition has been changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. References to this condition throughout the proposed permit have been revised to reflect the name change of this condition. The proposed condition, and the conditions which reference this condition, have been changed as follows:

C.17 Compliance Monitoring **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports** [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to **prepare** implement: a compliance monitoring plan to ensure that ~~reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

(1) ~~This condition;~~

- ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
 - ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
 - ~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
 - ~~(5) A a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ, (and local agency if applicable). The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, **supplemented from time to time by the Permittee**, and maintained on site, and is comprised of:~~
 - ~~(A)(1) Reasonable response steps that may be implemented in the event that compliance-related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and **an expected timeframe for taking reasonable response steps.**~~
 - ~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~
- (1) **Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**
 - (2) **If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
 - (3) **If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
 - (4) **Failure to take reasonable response steps shall constitute a violation of the permit.**

- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The Permittee is excused from taking not required to take any** further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment **and This shall be an excuse from taking further response steps** providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- ~~(d)(e)~~ **Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- ~~(e)(f)~~ **Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.** If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) ~~At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the shot blasting (EU-8 and EU-9) stack exhausts (SV-4 and SV-5) shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that

specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.5 Visible Emissions Notations

- (a) Visible emissions notations of the forge press cells (EU-1 - EU-6, EU-13 and EU-14) stack exhausts (SV-1, SV-2 and SV-9) shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

Change 7:

The language stating that the condition is not federally enforceable has been removed from Conditions C.3, C.4, C.5 and C.7. Federal law states that failure to comply with any permit condition issued under a program that has been approved into a State Implementation Plan (SIP) is to be treated as a violation of the SIP (40 CFR 52.23). This has the effect of making all FESOP conditions federally enforceable. Indiana's FESOP program was approved as a part of Indiana's SIP at 40 CFR 52.788. Neither the program nor the underlying rule, 326 IAC 2-8 contains provisions for designating certain conditions as not federally enforceable.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. ~~The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(e) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.~~

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name:	Eaton Corporation
Source Location:	2930 Foundation Drive, South Bend, Indiana 46628
County:	St. Joseph
SIC Code:	3462
Operation Permit No.:	F 141-13952-00057
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Eaton Corporation relating to the operation of a metal product forging and fabricating source. Eaton Corporation was issued FESOP 141-5555 on December 11, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) shot blast machine, identified as EU-8, constructed in 1980, equipped with a bag-house and exhausting through stack SV-4, capacity: 28 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (b) One (1) shot blast machine, identified as EU-9, constructed in 1997, equipped with a bag-house and exhausting through stack SV-5, capacity: 34 cubic feet, with a maximum process weight rate of 3.324 tons per hour.
- (c) Six (6) forge press cells, identified as EU-1 through EU-6, controlled by five (5) hydrostatic precipitators (rotoclones), each cell is equipped with one (1) load tub lift and bowl loader, with a total of two (2) meter boxes, and twenty-one (21) induction coils, with three (3) forge press cells (EU-1 through EU-3) exhausting to stack SV-1 and three (3) forge press cells (EU-4 through EU-6) exhausting to stack SV-2, maximum capacity: 4.05 tons of steel billets per hour, total.
- (d) One (1) forge press cell, identified as EU-13, constructed in 1998, controlled by a hydrostatic precipitator (rotoclone), equipped with one (1) load tub lift, one (1) meter box, one (1) bowl loader, and four (4) induction coils, exhausting to stack SV-9, maximum capacity: 1.04 tons of steel billets per hour.
- (e) One (1) 3,000-ton forge press cell (Serial No. 21601), identified as EU-14, constructed in 1999, controlled by a hydrostatic precipitator (rotoclone) and including five (5) induction coils with a maximum temperature up to 2,250EF, two (2) inverters, one (1) billet load system, one (1) transform conveyor and one (1) cool down conveyor, exhausting through stack SV-9, maximum capacity: 1.04 tons of steel billets per hour.

The following emission unit has been removed from this source: One (1) six-station tableblast shot blast machine, identified as EU-7, constructed in 1994, equipped with a baghouse and exhausting

to stack SV-3, maximum process weight rate: 1.159 tons per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. There are no boilers at this source.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including two (2) maintenance parts washers with capacities less than 80 gallons each and using only non-halogenated solvents. [326 IAC 8-3]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1]
- (d) Natural draft cooling towers not regulated under a NESHAP.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved roads and parking lots with public access.
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. Specifically including the following equipment, with dry processes exhausting to bag/barrel filters and wet processes having self-contained coolant reservoirs, with equipment in the die set up area exhausting to stack SV-7 and equipment in the tool room exhausting to stack SV-8: [326 IAC 6-1]
 - (1) Engin 20 X 54 lathe
 - (2) Engin 16 X 102 lathe
 - (3) Two (2) 12" wheel grinders
 - (4) Jet abrasive cut off saw
 - (5) Vertical band saw
 - (6) Norton surface grinder
 - (7) Vertical belt polisher
 - (8) Two (2) Taft Peirce surface grinders
 - (9) Cincinnati tool grinder
 - (10) ID/OD grinder

- (11) Making tool grinder
 - (12) US Electric double end grinder
 - (13) Two (2) double end tool grinders
 - (14) Powermatic belt/disc grinder
 - (15) Abrasive wheel cut off saw
 - (16) 10" double end tool grinder
 - (17) 4 Ft. radial drill press
 - (18) Engin 10 X 30 Lathe
 - (19) Bridgeport mill vertical 9 X 42 mill
 - (20) Engin lathe
 - (21) Enterprise horizontal mill
 - (22) Giddings 10TF CNC lathe
 - (23) Giddings 15TF CNC
 - (24) Marvel horizontal saw
 - (25) Madison grinder
 - (26) OKK mill
 - (27) Bridgeport vertical mill
 - (28) Four (4) drill presses
 - (29) Arbor press
 - (30) Johansson drill press
 - (31) Clausing 15" lathe
 - (32) Clausing band saw
 - (33) Kondia power mill
 - (34) Monarch 18" CNC lathe
 - (35) Cinn 273A grinder
 - (36) Heem 18" vertical saw
 - (37) Dewalt 12" radial saw
 - (38) Wadtkin 12" table saw
 - (39) Empire sand blast cabinet
 - (40) 3012U band saw
 - (41) 16" Boring mill
 - (42) Mazak CNC milling machine
 - (43) Okuma CNC Lathe LB35II
 - (44) Okuma CNC Lath L1420
 - (45) Mitsubishi DWC90HA wire EDM
 - (46) Dake movable bed arbor machine
- (h) Welders for maintenance - have manganese compounds in rod. Small amount of spray cans are used to mark containers for maintenance (Rustoleum) which contains toluene and xylene. [326 IAC 6-1]
- (i) Oil recovery system.
- (j) Two (2) electric Tool room heat treat cabinets

- (k) Water evaporator
- (l) One (1) plastic blast system, identified as EU-10, constructed in 1994, controlled by a baghouse and Hepa filter, and exhausting to stack SV-6. [326 IAC 6-1]

Existing Approvals

- (a) FESOP 141-5555-00057, issued on December 11, 1996 and expires on December 11, 2001,
- (b) First Significant Permit Modification SMF 141-9540-00057, issued on May 29, 1998,
- (c) First Administrative Amendment 141-10351-00057, issued on February 24, 1999, and
- (d) Second Administrative Amendment 141-8885-00057, issued on April 21, 1999.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) FESOP 141-5555-00057, issued on December 11, 1996 and expiring on December 11, 2001

Condition D.1.2: The PM₁₀ emissions from the entire source shall not exceed 8.25 tons per month. Therefore, the requirements of 326 IAC 2-7 do not apply.

Reason not incorporated: The PM₁₀ hourly limits in the proposed permit will be sufficient to show that the requirements of 326 IAC 2-7 do not apply.

- (b) FESOP 141-5555-00057, issued on December 11, 1996 and expiring on December 11, 2001

Condition D.1.5: Daily visible emission notations of the shot blasting baghouse operations and rotoclones (hydrostatic precipitators) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. Normal emissions are emissions occurring, not including startup or shutdown, when all equipment is operating satisfactorily. Abnormal emissions are those that exceed the normal by an amount sufficient to be readily noticeable to a person familiar with the normal emissions. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Reason not incorporated: IDEM, OAQ, has determined that daily compliance monitoring is not sufficient to monitor continuous compliance with the applicable rules for these types of operations. Therefore, visible emissions will be required once per shift in the proposed permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on February 22, 2001. Additional information was received on June 16, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 and 2 of 2 of Appendix A of this document for detailed emissions calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	Greater than 250
PM ₁₀	Greater than 250
SO ₂	Less than 25
VOC	Less than 25
CO	Less than 25
NO _x	Less than 25

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Unrestricted Potential Emissions (tons/year)
Individual	Less than 10
TOTAL	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀ is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 11, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F 141-5555-00057; issued on December 11, 1996) and subsequent modifications and amendments to the FESOP.

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Two (2) shot blast machines (EU-8 and EU-9)	less than 192	less than 95.9	-	-	-	-	-
Eight (8) forge press cells (EU1-EU6, EU-13 and EU-14)	2.68	0.021	-	-	-	-	-
Insignificant Activities	3.0	3.0	1.00	5.00	10.0	15.0	1.00
Total PTE After Issuance	198	98.9	1.00	5.00	10.0	15.0	1.00

The potential to emit PM is limited so that the requirements of 326 IAC 2-2, Prevention of Significant Deterioration (PSD), are still not applicable. The potential to emit PM₁₀ is limited pursuant to 326 IAC 2-8-4, FESOP. Therefore, the requirements of 326 IAC 2-7, Part 70, are still not applicable. The limitations are explained in the State Rules Applicability section of this document.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the

formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone.

- (b) St. Joseph County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

- (a) There are still no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.
- (c) The requirements of 40 CFR Part 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning, are not applicable to the two (2) maintenance parts washers because the parts washers do not use any halogenated solvents.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The unrestricted potentials to emit PM and PM₁₀ are greater than 250 tons per year. The potential to emit PM from the total of the two (2) shot blasting machines (EU-8 and EU-9) shall not exceed 43.8 pounds per hour, which is double the PM₁₀ limit pursuant to 326 IAC 2-8-4. The PM₁₀ limit is doubled because PM emissions from shot blasting are generally greater than PM₁₀ emissions. The PM emissions from the total of the eight (8) forge press cells shall not exceed 0.613 pounds per hour, which is equivalent to potential to emit PM before controls. This will result in PM emissions of less than 192 tons per year from the total of the two (2) shot blasting units, 2.68 tons per year from the total of the eight (8) forge press cells and less than 198 tons per year, which is less than 250 tons per year, from the total of all facilities at this source, including insignificant activities. Therefore, the requirements of 326 IAC 2-2, PSD, do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of NO_x in St. Joseph County. The NO_x emissions result from insignificant combustion units. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM₁₀, SO₂, VOC, CO and NO_x shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

Pursuant to FESOP 141-5555-00057, issued on December 11, 1996, and in order to comply with 326 IAC 2-8, FESOP, the PM₁₀ emissions from the total of the two (2) shot blasting machines (EU-8

and EU-9) shall not exceed 21.89 pounds per hour. The PM₁₀ emissions from the total of the eight (8) forge press cells shall not exceed 0.005 pounds per hour. This will result in PM₁₀ emissions of less than 95.9 tons per year from the two (2) shot blasting machines, less than 0.021 tons per year from the eight (8) forge press cells and less than 98.9 tons per year, which is less than 100 tons per year, from the total of all facilities at this source, including insignificant activities.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity for this source, located north of Kern Road and east of Pine Road in St. Joseph County, shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-1 (Nonattainment area particulate limitations)

This source is located in St. Joseph County, which is listed in 326 IAC 6-1-7, but the source is not specifically listed in 326 IAC 6-1-18. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1-2 are applicable.

- (a) Pursuant to 326 IAC 6-1-2(a), the two (2) shot blast machines (EU-8 and EU-9) at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). This is equivalent to 0.996 pounds per hour from the one (1) shot blast machine identified as EU-8, when operating at a flow rate of 3,907 actual cubic feet per minute, and 1.53 pounds per hour from the one (1) shot blast machine identified as EU-9, when operating at a flow rate of 6,136 actual cubic feet per minute. Based on the calculations on page 1 of 2 of TSD Appendix A, the two (2) shot blast machines will comply with this rule. The baghouses for PM control shall be in operation at all times when the shot blast machines are in operation.
- (b) Pursuant to 326 IAC 6-1-2(a), the eight (8) forge press cells (EU-1 through EU-6, EU-13 and EU-14) at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). This is equivalent to 0.425 pounds per hour from the two (2) forge press cells identified as EU-13 and EU-14, when operating at a flow rate of 1,654 actual cubic feet per minute, 0.478 pounds per hour from the three (3) forge press cells, identified as EU-1 through EU-3, when operating at a flow rate of 1,859 actual cubic feet per minute, and 0.414 pounds per hour from the three (3) forge press cells identified as EU-4 through EU-6, when operating at a flow rate of 1,610 actual cubic feet per minute. Based on the calculations on page 2 of 2 of TSD Appendix A, the eight (8) forge press cells will comply with this rule. The hydrostatic precipitators (rotoclones) for PM control shall be in operation at all times when the eight (8) forge press cells are in operation.
- (c) Pursuant to 326 IAC 6-1-2(a), the insignificant brazing equipment, cutting torches, soldering

equipment, welding equipment, grinding and machining and plastic blast system at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). This is equivalent to 0.309 pounds per hour from the equipment exhausting through stack SV-7, when operating at a flow rate of 1,200 actual cubic feet per minute, and 0.540 pounds per hour from the equipment exhausting through stack SV-8, when operating at a flow rate of 2,100 actual cubic feet per minute. The devices for PM control shall be in operation at all times when the grinding and machining and plastic blast are in operation.

326 IAC 8-3-5 (Organic Solvent Degreasing Operations)

The two (2) insignificant maintenance parts washers, located in St. Joseph County and not equipped with remote solvent reservoirs, are subject to the requirements of 326 IAC 8-3-5 as follows:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator shall ensure that the following requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

- (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

All testing requirements from previous approvals were incorporated into this FESOP.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP.

- (a) The compliance monitoring requirements from for the two (2) shot blast machines (EU-8 and EU-9) from previous approvals, which are applicable to these facilities are as follows:
 - (1) In the event that bag failure has been observed:
 - (A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this proposed permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure,

response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this proposed permit (Section B - Emergency Provisions).
- (b) The two (2) shot blast machines (EU-8 and EU-9) are also subject to the following compliance monitoring requirements:
 - (1) Visible emissions notations of the shot blasting (EU-8 and EU-9) stack exhausts (SV-4 and SV-5) shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (2) The Permittee shall record the total static pressure drop across the baghouses controlling the two (2) shot blast machines (EU-8 and EU-9), at least once per shift when the shot blasting machines are in operation. Unless operated under conditions for which the Compliance Response specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
 - (3) An inspection shall be performed each calendar quarter of all bags controlling the shot blast machines (EU-8 and EU-9) when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.
- (c) The eight (8) forge press cells (EU-1 - EU-6, EU-13 and EU-14), are subject to the following compliance monitoring requirements:

Visible emissions notations of the forge press cells (EU-1 - EU-6, EU-13 and EU-14) stack

exhausts (SV-1, SV-2 and SV-9) shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the baghouses for the shot blasting machines and the hydrostatic precipitators for the forge press cells must operate properly to ensure compliance with 326 IAC 6-1 (Nonattainment area particulate limitations) and 326 IAC 2-8 (FESOP), and to make the requirements of 326 IAC 2-2, PSD, not applicable.

Conclusion

The operation of this metal product forging and fabricating source shall be subject to the conditions of the attached proposed FESOP No.: F 141-13952-00057.

**Appendix A: Emission Calculations
Baghouse Operations
Shot Blast Machines**

**Company Name: Eaton Corporation
Address City IN Zip: 2930 Foundation Drive, South Bend, Indiana 46628
FESOP: 141-13952
Pit ID: 141-00057
Reviewer: CarrieAnn Paukowits
Date: February 22, 2001**

PM and PM-10					PM and PM-10				
Stack ID	Unit ID	Unit Description	Grain Loading per Actual Cubic foot of Outlet Air* (grains/dry standard cub. ft.)	Flow Rate* (dscfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Control Efficiency (%)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
SV-4	EU-8	Tumblast	0.018	3610	55.7	244.0	99.0%	0.557	2.44
SV-5	EU-9	Tumblast	0.013	5699	63.5	278.1	99.0%	0.635	2.78
Totals:					119	522		1.19	5.22

Methodology for EU-8 and EU-9

Emission Rate in lbs/hr (after controls) = (grains/dry standard cub. ft.) (dry standard cub. ft./min) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

*Parameters determined by stack tests August 5, 1997 for EU-7 and July 29, 1997 for EU-8 and EU-9

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Emissions

SV-4

The following calculations determine the pound per hour equivalency of 0.03 gr/dscf, which is the PM limitation of 326 IAC 6-1-2:

$$\begin{array}{l}
 0.03 \frac{\text{grains}}{\text{dscf}} * 3907 \text{ acfm} * 460 \frac{\text{ft}^3}{\text{min}} + 528 \text{ Temp} * \frac{100 - 0 \% \text{ moisture}}{100} = 0.966 \text{ lb/hr} \\
 60 \frac{\text{minutes}}{\text{hour}} * \frac{1}{7000 \text{ grains}} = 0.966 \text{ lb/hr}
 \end{array}$$

SV-5

The following calculations determine the pound per hour equivalency of 0.03 gr/dscf, which is the PM limitation of 326 IAC 6-1-2:

$$\begin{array}{l}
 0.03 \frac{\text{grains}}{\text{dscf}} * 6136 \text{ acfm} * 460 \frac{\text{ft}^3}{\text{min}} + 528 \text{ Temp} * \frac{100 - 0 \% \text{ moisture}}{100} = 1.53 \text{ lb/hr} \\
 60 \frac{\text{minutes}}{\text{hour}} * \frac{1}{7000 \text{ grains}} = 1.53 \text{ lb/hr}
 \end{array}$$

**Appendix A: Emission Calculations
Forge Press Cells**

Page 2 of 2 TSD App A

Company Name: Eaton Corporation
Address City IN Zip: 2930 Foundation Drive, South Bend, Indiana 46628
FESOP: 141-13952
Pit ID: 141-00057
Reviewer: CarrieAnn Paukowits
Date: February 22, 2001

PM					PM				
Stack ID	Unit ID	Unit Description	Total Capacity (tons/hr)	PM Emission Factor (lb/ton)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Control Efficiency (%)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
SV-1 through SV-2	EU-1 through EU-6	Six forge press cells	4.05	0.1	0.405	1.77	90.0%	0.003	0.015
SV-9	EU-13	one forge press cell	1.04	0.1	0.104	0.456	90.0%	0.001	0.004
SV-9	EU-14	one forge press cell	1.04	0.1	0.104	0.456	90.0%	0.001	0.004
Totals:					0.613	2.68		0.005	0.023

PM-10					PM-10				
Stack ID	Unit ID	Unit Description	Total Capacity (tons/hr)	PM-10 Emission Factor (lb/ton)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Control Efficiency (%)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
SV-1 through SV-2	EU-1 through EU-6	Six forge press cells	4.05	0.09	0.365	1.60	90.0%	0.003	0.014
SV-9	EU-13	one forge press cell	1.04	0.09	0.094	0.410	90.0%	0.001	0.004
SV-9	EU-14	one forge press cell	1.04	0.09	0.094	0.410	90.0%	0.001	0.004
Totals:					0.552	2.42		0.005	0.021

Methodology

Emission Rate in lbs/hr (before controls) = Capacity * Emission Factor
Emission Rate in lbs/hr (after controls) = Emission Rate (before controls) (lbs/hr) * (1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)
Emission factors are from EPA 450/4-90-003; SCC # 3-04-007-06

Allowable Emissions

SV-9

The following calculations determine the pound per hour equivalency of 0.03 gr/dscf, which is the PM limitation of 326 IAC 6-1-2:

$$\begin{aligned}
 &0.03 \frac{\text{grains}}{\text{dscf}} * 1654 \text{ acfm} * \frac{460}{460 + 528} \frac{\text{Temp}}{68} * \frac{100 - 0 \% \text{ moisture}}{100} \\
 &\frac{60 \text{ minutes}}{\text{hour}} * \frac{1}{7000 \text{ grains}} = 0.425 \text{ lb/hr}
 \end{aligned}$$

SV-1

The following calculations determine the pound per hour equivalency of 0.03 gr/dscf, which is the PM limitation of 326 IAC 6-1-2:

$$\begin{aligned}
 &0.03 \frac{\text{grains}}{\text{dscf}} * 1859 \text{ acfm} * \frac{460}{460 + 528} \frac{\text{Temp}}{68} * \frac{100 - 0 \% \text{ moisture}}{100} \\
 &\frac{60 \text{ minutes}}{\text{hour}} * \frac{1}{7000 \text{ grains}} = 0.478 \text{ lb/hr}
 \end{aligned}$$

SV-2

The following calculations determine the pound per hour equivalency of 0.03 gr/dscf, which is the PM limitation of 326 IAC 6-1-2:

$$\begin{aligned}
 &0.03 \frac{\text{grains}}{\text{dscf}} * 1610 \text{ acfm} * \frac{460}{460 + 528} \frac{\text{Temp}}{68} * \frac{100 - 0 \% \text{ moisture}}{100} \\
 &\frac{60 \text{ minutes}}{\text{hour}} * \frac{1}{7000 \text{ grains}} = 0.414 \text{ lb/hr}
 \end{aligned}$$